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UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

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Steven P. Bradbury,
Plaintiff,

v. no. 02-24-cv-
00599-gwc

City of Montpelier,
Sam Lambert, Patrolman,
Hunter Lane, Patrolman,
Diane Matthews, Patrol Sergeant,
Ben Michaud, Patrol Sergeant,
Kevin Moulton, Deputy Chief,
Jeff Pearson, Detective Sergeant,
Individually and, as identified, police personnel in the MONTPELIER police department,
defendants.

AMENDED COMPLAINT AND JURY DEMAND

INTRODUCTION

1. Mr. Bradbury was falsely arrested and charged *twice* in violation of his rights and, further, was assaulted and battered by Montpelier police.

Parties

2. Mr. Bradbury is a resident of Vermont.
3. Montpelier is the capital of Vermont. The other defendants all serve on its police department.

Jurisdiction

4. Federal question under 28 U.S.C. §1332 (42 U.S.C. §1983 and 18 U.S.C. §1962(c)).

Venue

5. This judicial district is where plaintiff resides and where the City of Montpelier is located and the individual defendants serve on its police force.

FACTS COMMON TO ALL COUNTS

6. Plaintiff is an individual who has been harmed by systematic deprivation of his rights by defendants causing plaintiff to lose his car, his job, his freedom, and his girlfriend because of defendants' actions because he appeared to be easy pickings to MONTPELIER police when they falsely arrested him and assaulted and battered him claiming he made a turn into a Cumberland Farms gas station without using a proper turn signal.

7. The false arrest occurred in a Cumberland Farms gas station in 2020 where Mr. Bradbury was gassing up his car early on a Sunday morning while on his way to work.

8. Montpelier police illegally searched plaintiff's car after physically dragging him out of the car and injuring him and then sought a warrant to cover up their illegal search.

9. The car was impounded. Mr. Bradbury *never* got it back.

10. Later Defendants falsely charged Mr. Bradbury with stealing his girlfriend's laptop furthering their illegal conspiracy to abuse him.

COUNT ONE

(§1983 Civil Rights)

11. Paragraphs one through 10 are incorporated by reference.

12. Defendants' actions were under color of state law in violation of 42 U.S.C. §1983 causing Mr. Bradbury damages in an amount to be proven at trial.

COUNT TWO

(civil RICO)

13. Paragraphs one through 12 are incorporated by reference.

14. Defendants' actions are criminal and a conspiracy in violation of 18 U.S.C. §1962(c) causing damage to Mr. Bradbury's business or property in an amount to be proven at trial.

COUNT THREE

(assault and battery)

15. Paragraphs one through 14 are incorporated by reference.

16. Dragging Mr. Bradbury from his car was common law assault and battery causing him damages in an amount to be proven at trial.


WHEREFORE, Mr. Bradbury demands judgment

1. Awarding damages, trebled pursuant to statute;
2. Granting temporary and preliminary and permanent injunctive relief forbidding further abuse of process and other abuse of Mr. Bradbury; and
3. Granting such other and further relief as the Court may deem appropriate.

JURY TRIAL IS DEMANDED ON ALL ISSUES SO TRIABLE HEREIN.

Respectfully submitted,

Steven P. Bradbury, pro se

Steven P. Bradbury


Steven P. Bradbury. Date: 12/11/24

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** Mr. Hoisington is currently on sabbatical in Vermont (through December 31).